

JOHN MICHAEL McDONNELL, ESQ.
121 Washington Street
Post Office Box 476
Toms River, New Jersey 08754-0476
(732) 341-7551 Telephone
(732) 505-3109 Fax
Interim Trustee

**Movant Shall Certify Notice
To All Interested Parties Of
The New Hearing Date Fixed
By The Court.**

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FILED
TRENTON, NJ
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JAMES J. WALDRON
BY: *Heonell*
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In re:)	UNITED STATES BANKRUPTCY COURT
)	FOR THE DISTRICT OF NEW JERSEY
)	
)	Chapter 7 Proceeding
)	Case No. 01-58890 RTL
RAMIREZ, AMABLE)	
)	NOTICE OF MOTION TO DISMISS
)	DEBTOR'S CASE AND REVOKE
)	DISCHARGE, IF ANY
)	
Debtor(s))	
)	Hearing Date: October 30, 2001
)	ORAL ARGUMENT WAIVED

To: All parties on mailing list annexed hereto.

PLEASE TAKE NOTICE that on *29th* October 30th, 2001 at 10:00 a.m. of as soon thereafter as the matter may be heard, John Michael McDonnell, Interim Trustee, shall move before Honorable Raymond T. Lyons, Jr. of the United States Bankruptcy Court, 402 East State Street, Trenton, New Jersey, for entry of an Order dismissing debtor's petition by reason of debtor's failure to appear for an examination under Section 341(a) of the Bankruptcy Code, as required under Section 343 of the Bankruptcy Code; and

PLEASE TAKE FURTHER NOTICE that if you contest this Motion you must appear in Court on the date and time noted and you are further required to file with the Court and serve on the undersigned a written response no later than seven days prior to the hearing date set forth herein. This Motion shall be deemed uncontested unless responsive papers are timely filed; and

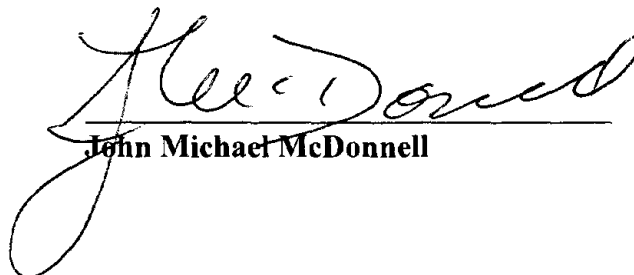
PLEASE TAKE FURTHER NOTICE that the movant shall rely upon the attached certification. No brief is submitted since no unique question of law exists; and

PLEASE TAKE FURTHER NOTICE that the undersigned waives oral argument; and

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PLEASE TAKE FURTHER NOTICE that a proposed form of Order is attached hereto.

Dated: October 1, 2001

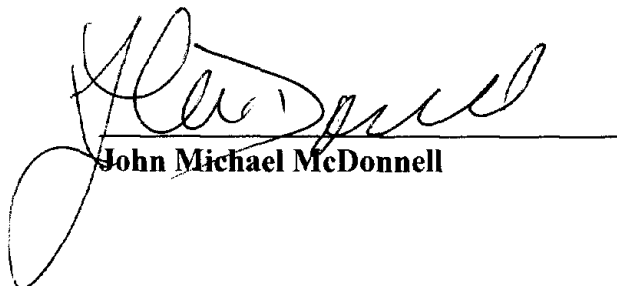


John Michael McDonnell

CERTIFICATION OF MAILING

I hereby certify that all persons on the mailing list annexed hereto were served with a copy of the Notice of Motion, Certification in Support of Motion, and proposed form of Order by mailing same to them at their address by regular mail, postage paid on ^{OCT 1} ~~July 9~~, 2001.

Dated: October 1, 2001



John Michael McDonnell

Mailing List

**US Trustee's Office
One Newark Center
Suite 2100
Newark, NJ 07102**

**Anna C. Little, Esq.
300 Kimball Street
Suite 106
Woodbridge, NJ 07095
(Attorney for Debtor)**

**Amable Ramirez
18 Howard Street 2nd Floor
New Brunswick, NJ 08901
(Debtor)**

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October 1, 2001

United States Bankruptcy Court Clerk
United States Courthouse
402 East State Street
Trenton, NJ 08608

RE: FILING OF MOTION TO DISMISS
DEBTOR - RAMIREZ, AMABLE
CHAPTER 7
CASE NO. 01-58890 RTL
HEARING DATE - October 30, 2001

Dear Sir/Madam:

With regard to the above captioned matter, enclosed please find an original and two copies of the following documents:

- * Notice of Motion to Dismiss;
- * Certification in Support of Motion to Dismiss; and
- * Proposed form of Order.

Kindly "file" same and return a "filed" copy in the return envelope provided. A copy of the documents have been mailed to the parties listed on the attached mailing list.

Very truly yours,


John Michael McDonnell, Esquire

JMM:mdm
enclosures

c: U.S. Trustee's Office
Anna C. Little, Esq. (Attorney for debtor)
Amable Ramirez (Debtor)